

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

GENOVA BURNS LLC

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In re: LTL MANAGEMENT, LLC, ¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan
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APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF

The applicant, the Official Committee of Talc Claimants (the “TCC” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “LTL”), by and through its proposed counsel, having filed substantially contemporaneously with this Application: (i) a motion for an order de-designating to non-confidential Exhibit A to the Term Sheet (Ex. 4 in the Apr. 18, 2023 Preliminary Injunction hearing) (the “Motion to De-designate”); (ii) a motion for the entry of a Protective Order in the same form as the Protective Order this Court entered in *In re LTL Management LLC*, 21-30589-MBK (Bankr. D.N.J.) (“LTL 1.0”) (Dkt. 948) (the “Motion for a Protective Order”); and (iii) a motion for the entry of an order compelling LTL to produce documents concerning the termination, or putative voidness or voidability, of the 2021 Funding Agreement (the “Motion to Compel”), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “**Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice**”), for the reasons set forth below:

1. On April 24, 2023, the TCC filed a motion to dismiss this case (the “Motion to Dismiss”). [Doc 286]

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

2. Consistent with this Court's direction at the hearing conducted on May 3, 2023, LTL and the TCC are conferring with respect to the exchange of discovery in preparation for an evidentiary hearing on the Motion to Dismiss.

3. The Motion to De-designate, the Motion for a Protective Order, and the Motion to Compel are each related to the TCC's efforts to conduct its discovery, and the issues therein have been known to the parties and previously addressed in letters to Court by both parties.

4. In order to maintain the discovery and briefing schedule suggested by the Court, it is imperative these uncomplicated issues be resolved as soon as possible. The TCC respectfully requests that these matters be scheduled for a hearing on **Tuesday, May 9, 2023, at 10:00 a.m.**

5. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

WHEREFORE, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

Dated: May 5, 2023

GENOVA BURNS LLC

By: /s/ Donald W. Clarke

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